

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
 ) No.  
 v. )  
 ) Violations: Title 18, United States Code,  
 ALLEN YOUNG ) Sections 1591(a) and (b)(2), 1594(a)  
 )

**COUNT ONE**

The SPECIAL AUGUST 2015 GRAND JURY charges:

Beginning no later than in or about June 2014 and continuing until in or about December 2014, in Northern District of Illinois, Eastern Division, and elsewhere,

ALLEN YOUNG,

defendant herein, in and affecting interstate commerce, knowingly harbored, transported, provided, obtained, and maintained by any means a person, namely, Minor A, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in harboring, transporting, providing, obtaining, and maintaining by any means Minor A, knowing and in reckless disregard of the fact that Minor A had attained the age of 14 years but had not attained the age of 18 years old and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(2).

**COUNT TWO**

The SPECIAL AUGUST 2015 GRAND JURY further charges:

Beginning no later than in or about mid-2014 and continuing until in or about December 2014, in Northern District of Illinois, Eastern Division, and elsewhere,

ALLEN YOUNG,

defendant herein, in and affecting interstate commerce, knowingly harbored, transported, provided, obtained, and maintained by any means a person, namely, Minor B, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in harboring, transporting, providing, obtaining, and maintaining by any means Minor B, knowing and in reckless disregard of the fact that Minor B had attained the age of 14 years but had not attained the age of 18 years old and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(2).

**COUNT THREE**

The SPECIAL AUGUST 2015 GRAND JURY further charges:

In or about June 2016, in Northern District of Illinois, Eastern Division, and elsewhere,

ALLEN YOUNG,

defendant herein, in and affecting interstate commerce, knowingly harbored, transported, provided, obtained, and maintained by any means a person, namely, Minor B, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in harboring, transporting, providing, obtaining, and maintaining by any means Minor B, knowing and in reckless disregard of the fact that Minor B had attained the age of 14 years but had not attained the age of 18 years old and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(2).

**COUNT FOUR**

The SPECIAL AUGUST 2015 GRAND JURY further charges:

Beginning no later than in or about 2014 and continuing until in or about 2015, in Northern District of Illinois, Eastern Division, and elsewhere,

ALLEN YOUNG,

defendant herein, in and affecting interstate commerce, knowingly harbored, transported, provided, obtained, and maintained by any means a person, namely, Minor C, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in harboring, transporting, providing, obtaining, and maintaining by any means Minor C, knowing and in reckless disregard of the fact that Minor C had attained the age of 14 years but had not attained the age of 18 years old and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(2).

**COUNT FIVE**

The SPECIAL AUGUST 2015 GRAND JURY further charges:

In or about 2014, in Northern District of Illinois, Eastern Division, and elsewhere,

ALLEN YOUNG,

defendant herein, in and affecting interstate commerce, knowingly attempted to harbor, transport, provide, obtain, and maintain by any means a person, namely, Minor D, and attempted to benefit, financially and by receiving anything of value from participation in a venture which engaged in harboring, transporting, providing, obtaining, and maintaining by any means Minor D, knowing and in reckless disregard of the fact that Minor D had attained the age of 14 years but had not attained the age of 18 years old and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a) and (b)(2) and 1594(a).

**COUNT SIX**

The SPECIAL AUGUST 2015 GRAND JURY further charges:

In or about 2015, in Northern District of Illinois, Eastern Division, and elsewhere,

ALLEN YOUNG,

defendant herein, in and affecting interstate commerce, knowingly attempted to harbor, transport, provide, obtain, and maintain by any means a person, namely, Minor E, and attempted to benefit, financially and by receiving anything of value from participation in a venture which engaged in harboring, transporting, providing, obtaining, and maintaining by any means Minor E, knowing and in reckless disregard of the fact that Minor E had attained the age of 14 years but had not attained the age of 18 years old and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a) and (b)(2) and 1594(a).

A TRUE BILL:

---

FOREPERSON

---

UNITED STATES ATTORNEY